

**National Guard Bureau Should Verify Data and Address Reported Challenges**

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A report to the Committee on Armed Services, House of Representatives

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**What GAO Found**

The National Guard Bureau (NGB) collects and tracks Freedom of Information Act (FOIA) data from all three National Guard components—NGB, Army National Guard, and Air National Guard. NGB reports FOIA data to the Department of Defense (DOD). NGB officials stated they provide Army National Guard and Air National Guard FOIA data to the Army and the Air Force, respectively. The National Guard tracks data on FOIA requests received, processed, and backlogged through various systems (see figure).

**Freedom of Information Act Tracking Systems**

Freedom of Information Act (FOIA) Tracking Systems	Access to Tracking System and FOIA data	Log, Process, and Close Requests in Tracking System	Send National Guard FOIA Data to DOD for Annual Report to Attorney General
Army's FOIA Tracking System	Army National Guard Units Army FOIA Office National Guard Bureau	Army National Guard Units	Army FOIA Office (Army National Guard FOIA data)
Air Force's FOIA Tracking System	Air Force FOIA Office National Guard Bureau	National Guard Bureau	Air Force FOIA Office (Air National Guard FOIA data)
National Guard Bureau Manual Spreadsheet	National Guard Bureau	National Guard Bureau	National Guard Bureau

Source: GAO analysis of National Guard Bureau and Army documents, and interviews with National Guard Bureau, Army, Air Force, and Army National Guard officials. | GAO-26-108472

GAO found discrepancies in the accuracy of reported data that officials responsible for reporting National Guard FOIA data were unable to explain. Specifically, GAO found that the numbers of FOIA requests received, processed, and backlogged by the Army National Guard differed between Army National Guard and NGB data for fiscal years 2016 through 2024, in part because there is no single, standardized process across the National Guard components for verifying the accuracy of FOIA data. Moreover, FOIA managers that improperly log FOIA requests and the absence of tools to verify data entries have affected the accuracy of reported data. Without a standardized process to verify the accuracy of National Guard FOIA data, such as the number of FOIA requests received and processed or the extent of backlogs, NGB may continue to inaccurately report FOIA data and hinder transparency for Congress and the public.

National Guard FOIA officials identified challenges with insufficient staffing and inconsistent communication that have affected the timely processing of FOIA requests. However, NGB has not fully addressed these challenges. For example,

- NGB has not analyzed its headquarters workforce needs to know how many full-time equivalent staff are currently needed to process FOIA requests in a timely manner and address backlogs.
- NGB has not developed a plan to improve communication between NGB and officials responsible for processing FOIA requests in the field through a shared online environment.

Addressing data discrepancies and identified challenges can help DOD and the NGB report data more accurately and process FOIA requests more efficiently.

**Why GAO Did This Study**

FOIA enables the public to request access to government records and information from any federal executive branch agency. Each year, hundreds of thousands of FOIA requests are filed. For example, NGB continues to face challenges processing such requests within the 20-day time frame that FOIA requires.

House Report 118-529 includes a provision for GAO to review the National Guard's FOIA program. This report evaluates the extent to which (1) NGB and DOD have taken steps to ensure the accuracy of reported FOIA data, including request backlogs; and (2) NGB has identified and addressed challenges associated with the processing of FOIA requests.

GAO reviewed NGB and DOD policies on FOIA processing. It also analyzed National Guard FOIA data for fiscal years 2016 through 2024 and distributed a survey to Army and Air National Guard FOIA officials asking about policies and factors that affect timely processing of requests, among other issues. GAO also interviewed NGB and military service officials.

**What GAO Recommends**

GAO is making six recommendations, including that NGB develop a process to verify FOIA data accuracy, determine appropriate staffing levels needed to ensure the timely processing of FOIA requests, and develop a plan to improve communication between NGB and National Guard FOIA officials in the field. DOD concurred with GAO's recommendations and outlined actions it plans to take toward their implementation.